

Exhibit A



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LEFFERTS L. MABIE, JR. (1925-1996)
D.L. MIDDLEBROOKS (1926-1997)
DAVID H. LEVIN (1928-2002)
STANLEY B. LEVIN (1938-2009)

June 10, 2020

Via E-Mail

Suzanne Salgado, Esq.
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Re: Response to Defendants' June 9, 2020 Letter Re: Challenges to Cabell Privilege Claims

Counsel:

The Cabell County Commission ("Plaintiff") provides the below responses to the matters addressed in your June 9th letter. Further, if you believe that there are still open issues and/or if Defendants still wish to pursue prior privilege challenges they have not withdrawn, we will make ourselves available to meet and confer with you about any remaining challenges.

I. Third Party and Common Interest Claims

A. Marshall University, St. Mary's Hospital, and Cabell Huntington Hospital

Plaintiff confirms the withdrawal of the privilege claim for privilege log entry 5 and will produce the underlying document.

B. West Virginia Counties Represented by Counsel for the Cabell County Commission

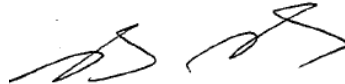
Plaintiff confirms its belief that there is a shared common legal interest between these counties and Cabell County as to the specific documents Defendants have challenged where other counties are included on the privilege log. Such counties include: Boone County, Fayette County, Kanawha County, Lewis County, Logan County, Wayne County, and Wyoming County. We do not see and are not aware of third parties involved in such communications on the entries that you have identified in the chart which you attached to your June 3rd letter. By way of example, PRVCTRL No. 72 is an email from Katie Mayo (paralegal with Levin

Papantonio) to several counties represented by several different law firms. Aside from attorneys and staff representing the counties, the recipients are Roscoe Adkins (Logan County Commission), Deborah Berry (Fayette County Commission), Jimmy Boggs (Wayne County Commission), Jennifer Herrald (Kanawha County Commission), Beth Thompson (Cabell County Commission), and Pam White (Boone County Commission). As stated, we are not aware of third-party involvement in these communications. If you believe there is a third-party involved in the privilege claims you have identified, please advise as to who you claim that to be, and we will address it.

II. Remaining Challenges

Plaintiff is not withdrawing its privilege claims as to any other challenges; however, Plaintiff also does not understand that any would remain based upon our responses and the information provided to date. Again, if Defendants wish, Plaintiff's counsel will make ourselves available to meet and confer further with you about this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brandon L. Bogle', with a stylized, cursive-like script.

Brandon L. Bogle